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Attorneys for Defendants
SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG TELECOMMUNICATIONS AMERICA LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

ZOLTAR SATELLITE ALARM SYSTEMS,
INC.

Plaintiff,

v.

LG ELECTRONICS MOBILE
COMMUNICATIONS CO., ET AL,

Defendant.

CIVIL ACTION NO. 5:06-CV-00044 JW

STIPULATION AND [PROPOSED]
ORDER (1) EXTENDING TIME FOR
SAMSUNG ELECTRONICS CO., LTD
TO FILE A RESPONSIVE PLEADING
AND (2) MODIFYING SCHEDULING
ORDER DEADLINES RELATED TO
SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG
TELECOMMUNICATIONS AMERICA
LLC'S COLLATERAL ESTOPPEL/RES
JUDICATA MOTION

Plaintiff ZOLTAR SATELLITE ALARM SYSTEMS, INC. ("Zoltar"), and Defendants SAMSUNG ELECTRONICS CO., LTD. ("SEC") and SAMSUNG TELECOMMUNICATIONS AMERICA LLC ("STA") (collectively "Samsung"), by and through their respective counsel, hereby stipulate and agree as follows:

(1) RESPONSIVE PLEADING OF SAMSUNG ELECTRONICS CO., LTD.: The time of SEC to answer, move, or otherwise respond to the Complaint be extended to and including July 23, 2007. SEC was served on April 23, 2007, by the parties' agreement through their respective counsel. This is the first extension of the date for filing a response to the Complaint, which alleges patent infringement. This extension is deemed necessary in order to allow counsel for SEC the opportunity to investigate and prepare a response.

(2) SCHEDULING ORDER DEADLINES RELATED TO COLLATERAL ESTOPPEL/RES JUDICATA MOTIONS: The March 9, 2007 Stipulation and Order Modifying Scheduling Order Deadlines Related to the Collateral Estoppel/Res Judicata Motions (Dkt. No. 103) (hereinafter the "March 9, 2007 Scheduling Order") be modified such that Samsung shall have until April 26, 2007 to file its Opening Brief, an extension of four days. STA was served on March 22, 2007 and SEC April 23, 2007, after the execution of the March 9, 2007 Scheduling Order and well after Zoltar served the defendants who had stipulated to the March 9, 2007 Scheduling Order. This extension is deemed necessary to provide Samsung additional time to prepare its briefing.

Zoltar and Samsung jointly request that the Court issue its Order and the foregoing Stipulation.

1 IT IS SO STIPULATED.

2 Dated: April 23, 2007

HELLER EHRMAN LLP

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4 By: /S/ Michael Plimack
Michael Plimack

5 Attorneys for Defendants
6 Samsung Electronics, Co. Ltd. and Samsung
Telecommunications America LLC

7 Dated: April 23, 2007

GIRARDI & REESE

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9 By: Howard B. Miller
Howard B. Miller

10 Attorneys for Plaintiff

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12 **ORDER**

13 The foregoing Stipulation between Plaintiff ZOLTAR SATELLITE ALARM SYSTEMS,
14 INC. ("Zoltar"), and Defendants SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG
15 TELECOMMUNICATIONS AMERICA LLC ("Samsung") for an extension of time within which
16 Samsung Electronics Co., Ltd. may file and serve its response to the Complaint for Patent
17 Infringement and modifying the March 9, 2007 Stipulation and Order Modifying Scheduling Order
18 Deadlines Related to the Collateral Estoppel/Res Judicata Motions (Dkt. No. 103) as to Samsung
19 having been received by the Court, and duly considered, AND GOOD CAUSE APPEARING
20 THEREFOR,

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22 IT IS HEREBY ORDERED:

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24 (1) That the time of Samsung Electronics Co., Ltd. to answer, move, or otherwise
25 respond to the Complaint be extended to and including July 23, 2007.

26 (2) That Samsung shall have until April 26, 2007 to file its Opening Brief on its
27 Collateral Estoppel/Res Judicata Motion. No other deadlines in the Court's March 9,
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1 2007 Stipulation and Order Modifying Scheduling Order Deadlines Related to the
2 Collateral Estoppel/Res Judicata Motions shall be modified by this Order.

3 DATED: April 24 2007
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6 THE HON. JAMES WARE
7 UNITED STATES DISTRICT JUDGE
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